| 1  | MICHAEL C. ORMSBY   |  |
|----|---|--|
| 2  | United States Attorney  Factory District of Weshington                            |  |
|    | Eastern District of Washington Jared C. Kimball                                   |  |
| 3  | Assistant United States Attorney Aine Ahmed                                       |  |
| 4  | Assistant United States Attorney  |  |
| 5  | Post Office Box 1494  |  |
| 6  | Spokane, WA 99210-1494<br>Telephone: (509) 353-2767                               |  |
| 7  | A N MADE CALL A MEG   | DIGEDICE COLUBE                                    |
| 8  | UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WASHINGTON                       |  |
| 9  |   |  |
| 10 | UNITED STATES OF AMERICA,   |  |
| 11 | Plaintiff,  | 14-CR-21-RMP-10                                    |
| 12 | VS.   | Motion to Stay Order of Release                    |
| 13 | CAMIEL C WADD   | Without Oral Argument                              |
| 14 | SAMUEL G. WARD,   | Without Oral Argument March 18, 2014, at 6:30 p.m. |
| 15 | Defendant.  | •  |
| 16 | Plaintiff, United States of America, by and through Michael C. Ormsby, United     |  |
| 17 | States Atterney for the Eastern District of Washington and Israel C. Vimbell and  |  |
| 18 | States Attorney, for the Eastern District of Washington, and Jared C. Kimball and |  |
| 19 | Aine Ahmed, Assistant United States Attorneys for the Eastern District of         |  |
| 20 | Washington, hereby moves the Court for an order staying Magistrate's Order of     |  |
| 21 | Release, filed March 18, 2014.  |  |
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| 28 | Motion to Stay Order of Release - 1 P40318dd.JKA                                  |  |

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| 2  | This Motion is based upon the files and records herein and the annexed |
| 3  | declaration of Jared C. Kimball.                                       |
| 4  |  |
| 5  | Dated: March 18, 2014.   |
| 6  |  |
| 7  | MICHAEL C. ORSMBY United States Attorney                               |
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| 9  | <u>s/ Jared C. Kimball</u><br>Jared C. Kimball                         |
| 10 | Assistant United States Attorney                                       |
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Motion to Stay Order of Release - 2 P40318dd.JKA I hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that:

- 1. On March 18, 2014, a detention hearing was held in the above entitled matter before the Honorable Magistrate Judge John Rodgers.
- 2. Magistrate Judge Rodgers orally ruled in favor of the release of the Defendant, on certain conditions, pending trial.
- 3. The United States has now filed a Motion for Review of Magistrate Judge Rodger's Order of Release and has requested an expedited hearing on this matter.
- 4. The hearing is scheduled for March 19, 2014, at 9:00 a.m. before the Honorable Chief Judge Rosanna Peterson.
- 5. I have contacted Defendant's attorney who has indicated to me that she opposes a stay of the Order of Release pending the review hearing.

I hereby declare under penalty of perjury, that the foregoing is true and correct.

Executed this 18th day of March, 2014, at Spokane, Washington.

s/ Jared C. Kimball
Jared C. Kimball
Assistant United States Attorney

**CERTIFICATE OF SERVICE** I hereby certify that on March 18, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Ms. Adrienne Thomas Thommes Law Office 1403 West Broadway Spokane, Washington 99201 s/Jared C. Kimball Jared C. Kimball Assistant United States Attorney 

Motion to Stay Order of Release - 4 P40318dd.JKA